



ARIZONA DEPARTMENT OF ECONOMIC SECURITY

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Janet Napolitano
Governor

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Director

September 13, 2006

WIA Guidance Letter # 16-06

Subject: WIA GAP in Service

Reference: U.S. Department of Labor Training and Employment Guidance Letter (TEGL) #17-05.

Purpose: This guidance letter clarifies Arizona's Workforce Investment Act policy for a gap in service that is more restrictive than Federal policy contained in TEGL #17-05.

Policy: A participant may be placed into a gap in service when a situation arises that will temporarily prevent program participation for greater than **90 consecutive calendar days**. This allows participants time to address barriers to continued participation. A gap in service must be related to one of the three circumstances identified below:

- Delay before the beginning of training;
- Health/medical condition or providing for a family member with a health/medical condition; or
- Temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.

A gap in service may be extended an additional 90 consecutive calendar days for a total of 180 days to resolve the issues that prevent the participant from completing program services. The additional gap in service must be related to one of the two circumstances identified below:

- Health/medical condition or providing for a family member with a health/medical condition; or
- Temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.

In the Virtual One-Stop system (VOS), the extension would be accomplished by ending the initial gap – (001) and creating another gap in service that would be not more than 90 consecutive calendar days. A delay in the beginning of training is not an appropriate reason to extend a gap in service for an additional 90 days. If this occurs, other training options should be explored with a different training provider.

Once a participant has not received any services funded by the WIA program or a partner program for ninety consecutive calendar days, has no gap in service, and is not scheduled for future services, the date of exit is automatically applied retroactively to the last day on which the individual received a service or activity. Exits will not automatically occur when a participant is placed **only** in a gap service with a VOS code of 001.

The VOS system does not recognize a gap in service as an activity or service. Therefore, participants must also be enrolled in the original scheduled activity at the time the gap in service became necessary for the VOS system to automatically close the case on the 91st day. The end date of the activity must match the end date of the gap in service for an automatic exit. If the participant requires additional services, the activity must be keyed into VOS prior to the 91st day so an automatic exit does not occur. Follow-up, case management, and support services do not qualify as VOS activities that extend the exit date.

Action Required:

This policy is effective immediately. The reason for a gap in service MUST be documented including the participant's intent to return to complete program services. This guidance letter must be distributed to all individuals responsible for WIA eligibility and case management, as well as others (e.g. data entry staff) who use the VOS system including sub-recipients, sub-grantees and/or service providers. For questions or assistance related to this policy, please contact your local area liaison at 602-542-3957.

This policy is subject to change. All WIA guidance letters are posted on the WIA website at <http://www.azdes.gov/wia>.

Sincerely,

A handwritten signature in black ink that reads "Lela Alston". The signature is written in a cursive, flowing style.

Lela Alston, Manager
Employment Administration
WIA Section